

OMB-83I FORM SUPPORTING STATEMENT

FOR OMB REVIEW OF ICR NO. 2025.01

**INFORMATION COLLECTION REQUEST FOR THE NATIONAL EMISSION
STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR THE
FRICTION MATERIALS MANUFACTURING SOURCE CATEGORY**

U.S. ENVIRONMENTAL PROTECTION AGENCY

EMISSION STANDARDS DIVISION

RESEARCH TRIANGLE PARK, NORTH CAROLINA 27711

MAY 2001

PART A OF THE SUPPORTING STATEMENT

1.0 Identification of the Information Collection

(a) Title and Number of the Information Collection.

“Reporting and Recordkeeping Requirements for the Friction Materials Manufacturing NESHAP.” This is a new ICR. The EPA tracking number is 2025.01.

(b) Short Characterization.

Potential respondents are owners or operators of friction materials manufacturing facilities. Friction materials manufacturing facilities manufacture friction material using a solvent-based process. Friction material is subsequently used to manufacture friction products that include, but are not limited to, disc brake pucks, disc brake pads, brake linings, brake shoes, brake segments, brake blocks, brake discs, clutch facings, and clutches. The NESHAP contains an emission limitation for solvent mixers at friction materials manufacturing facilities. Solvent mixers are the affected source.

Consistent with the General Provisions for National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories (40 CFR Part 63, Subpart A), respondents do not include the owner or operator of any facility that is not a major source of HAP emissions or any facility that does not operate affected solvent mixers, even if the facility is a major source.

Respondents must submit a one-time notification of applicability of the standard and a one-time notification of compliance status. Facilities must develop and implement a startup, shutdown, and malfunction plan and submit semiannual reports of any event where the plan was not followed. Semiannual reports for periods of operation during which the emission limitation is exceeded (or reports certifying that no exceedances have occurred) also are required. General requirements applicable to all NESHAP require records of applicability determinations; deviations; periods of startups, shutdowns, or malfunctions; monitoring records; and all other information needed to determine compliance with the applicable standard. Records and reports must be retained for a total of 5 years (2 years at the site; the remaining 3 years of records may be retained off-site). The files may be maintained in electronic form such as microfilm, computer disks, or magnetic tape.

The friction materials manufacturing NESHAP requires respondents to reduce the total organic

HAP emissions from their solvent mixers by preventing emission of no more than 15 percent (based on a 7-day block average) of the HAP solvent that is loaded into the solvent mixer. Respondents will likely use a solvent recovery system to reduce the amount of HAP solvent that is emitted. To show compliance with the HAP solvent emission limitation, respondents are required to use a weight measurement system (e.g., floor scale system for measuring weight of liquid contained in a small tank) to measure and record the weight of HAP solvent loaded into the solvent mixer and the weight of HAP solvent recovered for each mix batch. No performance testing is required. However, respondents would be required to conduct an initial compliance demonstration, which consists of measuring and recording the weight of HAP solvent loaded into each solvent mixer and the weight of HAP solvent recovered for each mix batch over the first 7 consecutive days after the compliance date. Respondents also must maintain records of specific information needed to determine that the standards are being achieved and maintained. These proposed requirements are described in Attachment 1.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection.

The U.S. Environmental Protection Agency (EPA) is charged under Section 112 of the Clean Air Act, as amended, to establish NESHAP for new or existing major sources or area sources that reflect:

... the maximum degree of reduction in emissions of [HAPs] that is achievable taking into consideration the cost of achieving the emission reduction, any nonair quality health and environmental reduction, and energy requirements. [section 112(d)(2)]

This level of control is commonly referred to as the maximum achievable control technology (MACT). Certain records and reports are necessary for the Administrator to confirm the compliance status of major sources and identify new or reconstructed sources subject to the standards. Specific information needed by EPA for the friction materials manufacturing NESHAP includes documentation that HAP emissions from affected solvent mixers are reduced according to the emission limitation. Such documentation necessitates measuring and recording the weight of HAP solvent loaded into the solvent mixer and the weight of HAP solvent recovered for each mix batch. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Act (42 U.S.C. 7414) and set

out in the NESHAP General Provisions.

(b) Practical Utility/Users of the Data.

The information will be used by Agency enforcement personnel to: (1) identify major sources and new, modified, or reconstructed sources subject to the standards; (2) ensure that MACT is being properly applied; and (3) ensure that the required emission limitation is achieved on a continuous basis. Based on the reported information, EPA can decide which facilities, records, or processes should be inspected. The records that facilities maintain will indicate to EPA whether the required emission limitation is achieved.

3. Nonduplication, Consultation, and Other Collection Criteria

(a) Nonduplication.

A search of existing standards and outgoing ICR's revealed no duplication of information-gathering efforts. However, certain reports required by State or local agencies may duplicate information required by the standards. In such cases, a copy of the report submitted to the State or local agency may be provided to the Administrator in lieu of the report required by the standards. The EPA has issued guidance to State and local agencies encouraging them to consolidate duplicative requirements into a single element to be reported.

(b) Public Notice Required Prior to ICR Submission to OMB.

This section is not applicable because this is a rule-related ICR.

(c) Consultations.

Participants in the development process for this proposed NESHAP included the Friction Material Standards Institute, Brake Manufacturers Council, Motor and Equipment Manufacturers Association, Automotive Parts Rebuilders Association, and representatives from numerous friction materials manufacturing companies. These participants were contacted for information and were invited to meetings. In addition, several States, including Colorado, Georgia, Indiana, North Carolina, Tennessee, and Wisconsin, were contacted for information. Consultations with these organizations and others will continue following proposal. A 60-day public comment period will be provided after proposal, during which the public will be given the opportunity to comment on the proposed NESHAP.

All comments received will be considered, and some may be reflected in the development of the final NESHAP.

(d) Effects of Less Frequent Collection.

If the relevant information were collected less frequently, EPA could not be reasonably assured that a facility is in compliance with the standards. In addition, our authority to take administrative action would be significantly reduced. Section 113(d) of the CAA limits the assessment of administrative penalties to violations which occur no more than 12 months before initiation of the administrative proceeding. Since administrative proceedings are less costly and require use of fewer resources than judicial proceedings, both we and the regulated community benefit from preservation of our administrative powers. Also, the reporting frequency in the rule is consistent with the requirements of title V permit programs. Consequently, less frequent reports would not result in a reduced burden.

(e) General Guidelines.

The friction materials manufacturing NESHAP requires that facilities retain records for a period of 5 years, which exceeds the 3-year retention period specified in the general information collection guidelines in 5 CFR 1320.6(f) of the Office of Management and Budget (OMB) regulations implementing the Paperwork Reduction Act. However, the 5-year retention period is consistent with the retention requirement in the General Provisions in subpart A of 40 CFR part 63 and the retention requirement in the operating permit program under 40 CFR part 70. All facilities subject to this rule will be required to obtain operating permits either through the State-approved permitting program or, if one does not exist, in accordance with the provisions of 40 CFR part 71. Thus, the 5-year record retention requirement of the rule adds no additional burden. At a minimum, respondents will be required to retain onsite the most recent 2 years of data. The remaining 3 years of data could be retained at a readily accessible onsite or offsite storage facility. None of the other guidelines in 5 CFR 1320.6 are being exceeded.

(f) Confidentiality.

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B --

Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) Sensitive Questions.

The information to be reported consists of emissions calculations and other information that are not of a sensitive nature. Therefore, this section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/SIC Codes.

Respondents are owners or operators of friction materials manufacturing facilities that are major sources of HAP emissions and use solvent mixers. Four facilities with existing solvent mixers are required to comply with the emission limitations in the proposed rule. Two of these facilities already have the solvent recovery systems necessary to meet the emission limitations. No new friction materials manufacturing facilities or solvent mixers are expected to be constructed during the 3-year ICR clearance period. The respondents are classified under the Standard Industrial Classification (SIC) codes 3714, 3299, 3499, 3568, and 3743; and North American Industrial Classification System (NAICS) codes 33634, 327999, and 333613. Only certain processes classified in the SIC or NAICS codes listed above will be regulated by the friction materials manufacturing NESHAP.

(b) Information Requested.

(i) Data items, Including Recordkeeping Requirements. Attachment 1 summarizes the reporting and recordkeeping requirements, including the required retention time for all records.

(ii) Respondent activities. The respondent activities required by the standards are identified in Table 1 and introduced in Section 6(a). To the extent practicable, the activities required by respondents were designed to make use of or to be consistent with existing reporting and recordkeeping practices.

5. The Information Collected--Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

A list of Agency activities is provided in Table 2 and introduced in Section 6(c).

(b) Collection Methodology and Management.

Information contained in the one-time only reports will be entered into the Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS) that is maintained and operated by our Office of Air Quality Planning and Standards (OAQPS). Information contained in the periodic reports submitted to us will be reviewed for accuracy and completeness. Data obtained during periodic visits by our personnel from records maintained by the respondents will be tabulated and published for internal use in compliance and enforcement programs.

(c) Small Entity Flexibility.

Information available to the EPA indicates that only four friction materials manufacturing facilities are subject to the NESHAP because they are major sources of HAP and operate solvent mixers. Only one of the four facilities subject to the NESHAP is a small business based on one of the definitions used by the Small Business Administration (500 or fewer company employees for SIC codes 3499 and 3568). The EPA does not expect that this small business facility will experience adverse impacts due to the proposed rule. This facility already operates the solvent recovery system necessary to control solvent mixer emissions. Furthermore, this facility already has the monitoring equipment required by the proposed rule. The only additional costs that this facility will incur as a result of the proposed rule are reporting and recordkeeping costs. The capital costs that this facility will experience as a result of the proposed rule are minimal (e.g., cost of a file cabinet for storing records).

The monitoring, reporting, and recordkeeping costs resulting from the proposed rule have been minimized for all facilities because the proposed rule does not include emission testing requirements. The monitoring, reporting, and recordkeeping requirements included in the proposed rule are necessary for facilities and the EPA to insure that the facilities are in compliance with the emission limitations. It is not expected that any facilities will experience adverse cost impacts due to the proposed rule.

(d) *Collection Schedule.*

Collection of data will begin after the effective date of the final friction materials manufacturing NESHAP. The compliance date for existing sources is 2 years after the effective date. The compliance date for new or reconstructed sources is the effective date if the source startup date is before the effective date or upon startup if the startup date is on or after the effective date. No new or reconstructed sources are anticipated during the 3-year ICR clearance period. The schedule for notifications and reports required by the rule is summarized below.

For facilities with existing solvent mixers, the initial notification stating that the facility is subject to the rule must be submitted no later than 120 days after the effective date of the rule. Facilities with new or reconstructed affected sources for which startup occurs on or after the effective date must submit the initial notification no later than 120 days after the source becomes subject to the rule. Facilities must demonstrate initial compliance with the emission limitation for solvent mixers by conducting an initial compliance demonstration within 7 days after the compliance date. Facilities must submit an initial notification of compliance status no later than 30 days following the completion of the initial compliance demonstration. Records necessary to determine continuous compliance must be compiled on a daily basis, and compliance reports must be submitted to the Administrator on a semiannual basis.

6. Estimating the Burden and Cost of the Collection

(a) *Estimating Respondent Burden.*

The annual burden estimates for reporting and recordkeeping are presented in Table 1. These numbers were derived from estimates based on EPA's experience with other standards.

(b) *Estimating Respondent Costs.*

The information collection activities for sources subject to the standards are presented in Table 1. Labor costs for reporting and recordkeeping activities were estimated based on the most recently available labor rate data from the U.S. Bureau of Labor Statistics (BLS) (<http://stats.bls.gov/news.release>). Labor costs are divided into the following three categories: (1) technical, (2) management, and (3) clerical. The base labor rates, including fringe benefits, reported by

BLS for March 2000 are \$28.59 per hour (\$28.59/hr) for technical personnel, \$43.46/hr for managerial personnel, and \$18.07/hr for clerical personnel. The base labor rates were adjusted by an overhead and profit rate of 167 percent. The resulting average hourly labor rates are \$48/hr for technical personnel, \$73/hr for management personnel, and \$30/hr for clerical personnel. In addition to labor costs, capital/startup costs include the costs of installing the necessary monitoring equipment and purchasing file cabinets for storing records. Operation and maintenance (O&M) costs include the O&M costs for monitoring equipment and photocopy and postage costs associated with reporting requirements. The capital/startup costs were estimated and annualized as described in the footnotes to Table 1.

(c) *Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the General Provisions for the MACT standards, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Table 2. Labor rates for Federal employees are based on the January 2001, Office of Personnel Management labor rates for General Schedule employees (<http://www3.opm.gov/oca/01tables/gshrlly/html/01gshr.htm>). The base labor rates are \$26.19/hr for technical personnel (GS-12, step 5), \$ 43.29 for management personnel (GS-15, step 5), and \$14.76/hr for clerical personnel (GS-7, step 5). The base labor rates were multiplied by the standard government benefits multiplication factor of 1.6. The resulting average hourly labor costs are \$42/hr for technical personnel, \$69/hr for management personnel, and \$24/hr for clerical personnel.

(d) *Estimating the Respondent Universe and Total Burden and Costs.*

The EPA has identified a total of four solvent-based friction materials manufacturing facilities as major sources of HAP emissions operating affected solvent mixers subject to the friction materials manufacturing NESHAP. No new friction materials manufacturing facilities are anticipated to be constructed during the 3-year ICR clearance period. Details on the number of respondents affected by each individual burden item are provided in the footnotes of Table 1.

(e) *Bottom Line Burden Hours and Costs/Master Tables.*

(i) *Respondent tally.* The bottom line respondent burden hours and costs, presented in Table 1, are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. The total annual number of responses is five. The estimated total annual hours are 577 at an annual labor cost of \$26,657. The estimated total capital/startup costs that would be incurred over the 3 years following proposal are \$15,912. The annualized capital/startup costs are \$2,235. The total annual O&M cost is estimated to be \$261. The total annualized cost requested (including the annualized capital/startup and O&M costs) is \$2,496.

(ii) *The Agency tally.* The bottom line Agency burden hours and costs, presented in Table 2, are calculated as in the respondent table, by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. In this case, the total cost is the sum of the total salary cost and total travel expenses for facilities visited. The total annual hours are 116. The total annual cost is \$4,883.

(iii) *Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

(f) *Reasons for Change in Burden.*

This section does not apply because this is a new collection.

(g) *Burden Statement.*

The average annual respondent burden for the four existing affected friction materials manufacturing facilities is estimated at 577 hours. This estimate includes time for preparing and submitting notices, gathering information, submitting reports, and maintaining records.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to (1) review instructions; (2) develop, acquire, install, and utilize technology and systems for the purposes of maintaining information, and disclosing and providing information; (3) adjust the existing ways to comply with any previously applicable instructions and requirements; (4) train personnel to be able to respond to a collection of information; (5) search data sources; (6) complete and review the collection of information; and (7) transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

Send comments on the EPA's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U. S. Environmental Protection Agency (2822T), 1200 Pennsylvania Avenue NW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street NW, Washington, DC 20503, marked "Attention: Desk Officer for EPA." Include the EPA ICR number and OMB control number in any correspondence.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

**TABLE 1. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS
OF THE PROPOSED RULE**

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C = A x B)	(D) Respondents per year ^a	(E) Technical person- hours per year (E = C x D)	(F) Management person-hours per year (F = E x 0.05)	(G) Clerical person- hours per year (G = E x 0.1)	(H) Cost,\$ ^b
1. Applications	NA							
2. Survey and Studies	NA							
3. Acquisition, Installation, and Utilization of Technology and Systems	54	1	54	1.3	72	3.6	7.2	\$3,935
4. Reporting Requirements								
A. Read instructions	0.5	1	0.5	1.3	0.7	0.0	0.1	\$36
B. Required activities								
Startup, shutdown, malfunction plan	32	1	32	1.3	43	2	4	\$1,577
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report								
Notification of applicability	2	1	2	1.3	3	0.1	0.3	\$146
Notification of constr./reconstr.	2	1	2	0	0	0.0	0.0	\$0
Notification of anticipated startup	2	1	2	0	0	0.0	0.0	\$0
Notification of actual startup	2	1	2	0	0	0.0	0.0	\$0
Notification of compliance status	4	1	4	1.3	5	0.3	0.5	\$291
Semi-annual compliance reports:								
Deviations ^c	8	1	8	0.20	1.6	0.1	0.2	\$87
No deviations ^d	8	2	16	1.1	18	0.9	2	\$991

TABLE 1. (continued)

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C = A x B)	(D) Respondents per year ^a	(E) Technical person- hours per year (E = C x D)	(F) Management person-hours per year (F = E x 0.05)	(G) Clerical person- hours per year (G = E x 0.1)	(H) Cost,\$ ^b
Startup, shutdown, malfunction report ^e	8	2	16	0.13	2	0.1	0.2	\$117
5. Recordkeeping Requirements								
A. Read instructions	4	1	4	1.3	5	0.3	0.5	\$291
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information								
Records of solvent weight measurements ^f	0.033	2600	86	1.3	114	6	11	\$6,252
Records of block average solvent weight ^g	2	52	104	1.3	139	7	14	\$7,578
Records of startup, shutdown, malfunction ^g	1	52	52	1.3	69	3	7	\$3,789
Copies of notifications/reports ^h	0.25	3	0.75	1.3	1	0	0	\$55
F. Time to train personnel	20	1	20	1.3	27	1.3	3	\$1,457
G. Time to adjust existing ways to comply with previously applicable requirements	NA							
H. Time to transmit or disclose information ^h	0.25	3	0.75	1.3	1.0	0.1	0.1	\$55
I. Time for audits	NA							

TABLE 1. (continued)

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C = A x B)	(D) Respondents per year ^a	(E) Technical person- hours per year (E = C x D)	(F) Management person-hours per year (F = E x 0.05)	(G) Clerical person- hours per year (G = E x 0.1)	(H) Cost,\$ ^b
TOTAL ANNUAL BURDEN AND COST (SALARY)					502	25.1	50.2	\$26,657
TOTAL ANNUAL NUMBER OF RESPONSES ⁱ				5				
ANNUAL CAPITAL COSTS:								
Monitoring equipment ^j								\$14,973
File cabinets ^k								\$940
Total annual capital								\$19,912
ANNUALIZED CAPITAL COSTS: ^l								
Monitoring equipment (10 year life, 7% interest -> CRF = 0.1424)								\$2,132
File cabinets (15 year life, 7% interest -> CRF = 0.1098)								\$103
Total annualized capital								\$2,235
TOTAL ANNUAL COSTS (O & M) ^m								\$261
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$2,496

^a A total of 4 major sources with a total of 7 existing solvent mixers are expected to comply during the 3-year ICR clearance period, for an average of $4/3 = 1.3$ plants per year and $7/4 = 1.75$ solvent mixers per plant. No new facilities and no new solvent mixers are expected to be constructed during the ICR clearance period.

^b Costs are based on the following hourly rates: technical at \$48, management at \$73, and clerical at \$30. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

^c Assumes 15% of respondents report deviations once a year.

^d Assumes 85% of respondents report no deviations semiannually.

^e Assumes 10% of respondents will have a startup, shutdown, or malfunction occur in a year that is not managed according to the plan.

^f Assumes solvent weights recorded once per hour (2 minutes [0.033 hr] per record) for 2,600 hr/yr (the industry average solvent mixer annual operating hours).

TABLE 1. (continued)

^g Assumes information is entered 1 time per week for 52 weeks/yr.

^h Assumes typical plant transmits one-time notifications of applicability and compliance status; the startup, shutdown, and malfunction plan; and 6 semi-annual reports of excess emissions (or no excess emissions) over the 3-year period, for a total of 9 items or an average of 3 items per year.

ⁱ The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 4E.

^j The capital costs for monitoring equipment is estimated at \$2,139 per solvent mixer for a floor scale system. (7 mixers x \$2,139 = \$14,973).

^k Assumes one standard four-drawer file cabinet per facility at a cost of \$235 per cabinet (4 cabinets x \$235 = \$940).

^l Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF = (i) \times (1 + i)^t / ((1 + i)^t - 1)$ where i = interest rate (%) and t = equipment life (years).

^m O&M costs include the following: (1) O&M for monitoring equipment estimated as 20% of the annual cost for monitors, and (2) photocopy and postage costs estimated as \$22/report.

N/A = Not Applicable.

TABLE 2. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT OF THE PROPOSED RULE

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C = A x B)	(D) Plants per year ^a	(E) Technical person-hours per year (E = C x D)	(F) Management person-hours per year (F = E x 0.05)	(G) Clerical person- hours per year (G = E x 0.1)	(H) Cost, \$ ^b
Litigation ^c	2,080	1	2,080	0.013	28	1	3	\$1,327
Excess Emissions Enforcement Activities ^d	48	1	48	0.067	3	0	0	\$153
Report Review								
Notification of applicability	2	1	2	1.3	3	0	0	\$128
Notification of constr./reconstr.	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of compliance status	40	1	40	1.3	53	3	5	\$2,552
Semi-annual compliance reports:								
Deviations ^e	20	1	20	0.20	4	0	0	\$191
No deviations ^f	2	2	4	1.1	5	0	0	\$217
Startup, shutdown, malfunction report ^g	20	2	40	0.13	5	0	1	\$255
Onsite inspection of plant records	8	1	8	0.13	1	0	0	\$51
TOTAL BURDEN AND COST (SALARY)					101	5	10	\$4,823
Travel Expenses for Plants Visited ^{h,i}								\$60
TOTAL ANNUAL COST (SALARY + EXPENSES)								\$4,883

^a A total of 4 major sources with a total of 7 existing solvent mixers are expected to comply during the 3-year ICR clearance period, for an average of $4/3 = 1.3$ plants per year and $7/4 = 1.75$ solvent mixers per plant. No new facilities and no new solvent mixers are expected to be constructed during the ICR clearance period.

^b Costs are based on the following hourly rates: technical at \$42, management at \$69, and clerical at \$24. Management person-hours and clerical person-hours are

TABLE 2. (continued)

assumed to be 5 percent and 10 percent of technical person-hours, respectively.

^c Assumes 1% of plants will be involved in litigation.

^d Assumes 5% of the plants will be involved in excess emissions enforcement activities.

^e Assumes 15% of respondents report deviations once a year.

^f Assumes 85% of respondents report no deviations semiannually.

^g Assumes 10% of respondents will have a startup, shutdown, or malfunction occur in a year that is not managed according to the plan.

^h Assumes Agency personnel will inspect records at 10% of plants.

ⁱ Assumes Agency personnel (1 person) will spend 1 day per plant, at \$50 per diem per day, and \$400 transportation expense per round trip to inspect records at plant.

ATTACHMENT 1

SUMMARY OF REPORTING AND RECORDKEEPING REQUIREMENTS

SUMMARY OF REPORTING AND RECORDKEEPING REQUIREMENTS

Requirements	Regulation Reference
Notifications	
Initial notifications (including construction/reconstruction)	63.5, 63.9(b), and 63.9535(a)-(d)
Notification of compliance status	63.9(h) and 63.9535(e)
Records	
Record retention	63.10(b)(1) and 63.9550
Documentation supporting initial notifications and notifications of compliance status	63.10(b)(2)(xiv) and 63.9545(a)(1)
Records related to startup, shutdown, and malfunction	63.6(e)(3) and 63.9545(a)(2)
Monitoring records showing solvent mixers meet the emission limitation	63.10(b)(2)(vi), (x), and (xi); 63.9530; and 63.9545(b)
Reports	
Semiannual compliance report: <ul style="list-style-type: none"> • Startup, shutdown, and malfunction reports • No deviations/no out-of-control monitoring system • Deviations/out-of-control monitoring system 	63.9540 63.10(d)(5) and 63.9540(b)(4) and (d) 63.9540(b)(5)-(6) 63.9540(c)